

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Greenbelt Division

FILED
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AT GREENBELT
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

SUBHI H SHAHIN

Plaintiff

V.

CIVIL ACTION NO PX 20 CV 3242

THE UNITED STATES OF AMERICA

Defendants

JURY TRIAL DEMAND

COMPLAINT FOR A CIVIL CASE

THE PARTIES TO THIS COMPLAINT:

A THE PLAINTIFF(S)

SUBHI H SHAHIN 6010 WESTCHESTER PARK DR. APT 202 COLLEGE PARK
PRINCE GEORGES COUNTY MARYLAND 20740 TEL: (301)3954618
E-MAIL SUBHI1@VERIZON.NET

B THE DEFENDANTS

THE UNITED STATES OF AMERICA 1600 PENNSYLVANIA AVE NW
WASHINGTON DC 20500

JURISDICTION

THE BASIS FOR JURISDICTION IS A FEDERAL QUESTION UNDER 28 USC § 1331 A
CASE ARISING UNDER THE UNITED STATES CONSTITUTION OR FEDERAL LAW OR
TREATIES IS A FEDERAL QUESTION AND THE FEDERAL PROVISION 28 USC 1346
TORT NEGLIGENCE AND CONSTITUTIONAL VIOLATION



STATEMENT OF CLAIM

1- THE PLAINTIFF SUBHI H SHAHIN WAS BORN IN BETHLEHEM ISRAEL WORKED IN KUWAIT FOR ALMOST 20 YEARS

2- AS THE DIRECT RESULT OF THE WAR IN KUWAIT/IRAQ HE LOST HIS BUSINESS THE SHAHIN GROUP INC.

3-SINCE 1979 MY WIFE DONNA L SHAHIN AKA DONNA L WHITEHEAD WAS WORKING AT THE WALTER REED ARMY MEDICAL CENTER AS A RESEARCH BIOCHEMIST. 1/27/1989 SHE COLLAPSED AND WAS OUT OF WORK THE OWCP REFUSE TO ACCEPT HER FECA CLAIM FOR CHEMICAL EXPOSURE INSTEAD APPROVING HER INJURY FOR PROLONGED DEPRESSIVE REACTION

4-OWCP/ECAB DENIED AN ATTENDANT ALLOWANCE FOR THE ACCEPTED INJURY HOWEVER THEY NEVER RULED ON THE CONSEQUENTIAL INJURY ALLOWANCES

5-12/29/1983 MY SON SHAHIN S SHAHIN WAS BORN AND FOR MANY YEARS KEEP COMPLAINING ABOUT HIS LEGS AND BACK PAIN TO JOHN HOPKINS AND THEY KEPT SAYING IT WAS GROWING PAIN HE START EATING AS A COPING MECHANISM HE DEVELOPED MORBID OBESITY HE JOIND NIH FOR WEIGHT LOSS PROGRAM WERE HE WAS DIAGNOSED WITH MYOFACIAL PAIN SYNDROME ON 07/16/01 WAS DIAGNOSED WITH COGENITAL LUMBAR SPINAL STENOSIS BY DR CHARLES HARTJEN THIS BIRTH DEFECT IS THE PROOF OF EVIDENCE MY WIFE WAS EXPOSED TO ORGANIC CHEMICAL IN THE CONTEXT OF HER WORK

6- ON OR ABOUT 11/15/2019 I FOUND OUT THAT EXPOSURE TO ORGANIC SOLVENTS DURING THE FIRST TRIMESTER OF PREGNANCY CAN INCREASE THE RISK OF BIRTH DEFECT

7- MY SON'S CURRENTLY DISABLED WITH CHRONIC PAIN AND DEPRESSION AND HIS CONDITIONS WILL GET WORSE HIS FUTURE IS DARK

8-MY WIFE MY SON AND METHE SILENT VICTIMS NO FRIENDS NO FAMILY SINKING INTO POVERTY AND BEYOND IN THE VERGE OF BEING HOMELESS THE FUTURE IS DARK MY SON MUST BE PROTECTED



NOTE

PLAINTIFF LEAVE TO AMEND HIS COMPLAINT FOR BETTER STATMENT OF FACT
AND BETTER PLEADING

PLAINTIFF LEAVE TO AMEND HIS COMPLAINT BY ADDING PLAINTIFFS

PLAINTIFF LEAVE TO AMEND HIS COMPLAINT BY ADDING DEFENDANTS

EXHIBIT IS ENCLOSED AS A PART OF THIS COMPLAINT

RELIEF

1- TWO MILLION DOLLARS TO BE PAID BY THE DEFENSE DEPT. UNDER COVID 19
RELIEF

2-ONE MILLION FIVE HUNDRED TWELVE THOUSAND DOLLARS REPRESENT THREE
TIMES FOR THE ATTENDENT ALLOWANCES

3 – FIFTEEN MILLION TO PROTECT MY SON FUTURE AND TO ALLOW HIM LIVE
WITH DIGNITY

4- ALL MY SON FUTURE MEDICAL NEED WILL BE BORN BY THE DEPT OF DEFENCE
OR OWCP

RESPECTFULLY SUBMITTED

A handwritten signature in black ink, appearing to read 'Subhi H Shahin', followed by the date '11/9/2020' written in a similar cursive style.

SUBHI H SHAHIN

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